

EXHIBIT C

11/6/2024

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Sergey Edunov

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1 in any for Llama 3.

2 BY ATTORNEY STEIN:

3 Q. And how about for Llama 4?

4 ATTORNEY MORTON: Object to form.

5 THE WITNESS: Yeah, again, very hard for
6 me to tell since for Llama 4 specifically I'm
7 focusing on the pretraining team; so my work is
8 mostly around, like, getting the things going and
9 running. So I don't necessarily -- a part of the
10 decision-making process here.

11 BY ATTORNEY STEIN:

12 Q. Were you ever involved in discussions
13 about the legal risks of using copyrighted material?

14 ATTORNEY MORTON: Object to form. You can
15 answer that yes or no. Don't reveal any privileged
16 communications.

17 THE WITNESS: Outside of the discussions
18 with our legal counsel, no, I don't think so.

19 BY ATTORNEY STEIN:

20 Q. But the answer's "Yes"? You were involved
21 in those discussions?

22 A. So --

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1 ATTORNEY MORTON: Caution you not to
2 reveal any privileged communications.

3 THE WITNESS: So the way the process work,
4 we have this SRT system where we submit requests for
5 any data approval -- approved, including data for
6 intern papers, not -- or any other publications for
7 that matter. And during that review process, I am
8 involved in discussions.

9 BY ATTORNEY STEIN:

10 Q. And you relied on the outcome of that
11 review process?

12 A. I do rely on the outcome of that review
13 process all the time.

14 Q. Did anyone on your team ever raise
15 concerns directly to you about the use of
16 copyrighted material?

17 ATTORNEY MORTON: Object to form.

18 THE WITNESS: Nothing that I remember.

19 BY ATTORNEY STEIN:

20 Q. Were you involved in any internal reviews
21 or audits related to the training datasets?

22 ATTORNEY MORTON: Object to form.

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1 THE WITNESS: Any internal -- what kind of
2 audits do you mean? Like for legal team?

3 BY ATTORNEY STEIN:

4 Q. Yes.

5 A. With the legal team, I was involved in the
6 analysis of one of the datasets, yes.

7 Q. Which dataset was that?

8 ATTORNEY MORTON: Objection. I'm going to
9 instruct the witness not to answer on the basis of
10 privilege.

11 BY ATTORNEY STEIN:

12 Q. How would you typically communicate with
13 the legal department about the use of copyrighted
14 material?

15 A. We typically use our SRT tool for the
16 majority of communications. At least I do. That's
17 my main channel.

18 Q. And what steps did you take to ensure
19 compliance with copyright law in your role?

20 ATTORNEY MORTON: Objection to form.

21 And caution you not to reveal any
22 privileged communications.

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1 THE WITNESS: Yeah. That is not part of
2 my job. I follow instructions from our legal team.

3 BY ATTORNEY STEIN:

4 Q. Do you know how Meta attained the Books3
5 dataset?

6 A. No. I'm not aware of it.

7 Q. Can you describe the role of Books3 in the
8 training of Llama 1?

9 ATTORNEY MORTON: Object to form.

10 THE WITNESS: I was not involved in Llama
11 1.

12 BY ATTORNEY STEIN:

13 Q. Can you describe same with respect to
14 Llama 2?

15 ATTORNEY MORTON: Object to form.

16 THE WITNESS: Books3 was part of the
17 training data.

18 BY ATTORNEY STEIN:

19 Q. And what was --

20 Was the -- was that dataset -- the Books3
21 dataset -- involved in any experiments?

22 ATTORNEY MORTON: Object to form.

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1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Michael P. Hensley, Registered Diplomate

4 Reporter for the State of California, CSR No. 14114,

5 the officer before whom the foregoing deposition was

6 taken, do hereby certify that the foregoing

7 transcript is a true and correct record of the

8 testimony given; that said testimony was taken by me

9 stenographically and thereafter reduced to

10 typewriting under my direction; that reading and

11 signing was requested; and that I am neither counsel

12 for, related to, nor employed by any of the parties

13 to this case and have no interest, financial or

14 otherwise, in its outcome.

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Michael P. Hensley, CSR, RDR